

EXHIBIT 96-B
Redacted Version of
Document Sought to be Sealed

30(b)(6) Deposition Notes (6/2/2022)

What did I do for preparation?

- ~38 hours of meetings; 10 sessions; over 4 weeks.
- 10 hours of reviewing documents.
- Who did I speak with?
 - Data Science: Maggie Ji; Gerardo Zaragoza regarding Hive and TAO.
 - FTech: Oriana Torres and Ricardo Brums regarding retention of unstructured data (e.g., GSuite; Dropbox; Quip; internal tools)
 - CM: Jennifer Allen regarding the legal hold notice for this case.
 - InfoGov: Yodi Hailemariam regarding corporate policies including FTCO & US Privacy Program records management policies.
 - Mayur Patel: Software engineer on Privacy team. Discussions regarding TAO.

Information Governance: Responsible for risk assessment, and also responsible for legal and regulatory compliance of Company records. Global Records Management within InfoGov team is responsible for establishing, implementing and managing policies and procedures regarding creation, use, retention and disposition of Company Records.

Records: A Record is recorded information that:

- Is created, received or maintained by an Facebook Personnel in that person's business capacity;
- Relates to Facebook or its business;
- Is in the possession, custody, or control of Facebook; and
- Is subject to legal or regulatory retention requirements or that is necessary for the operation of the business.

Cambridge Analytica Legal Hold:

- [REDACTED] of legal hold notice.

- [REDACTED]
 - [REDACTED]

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- The diagram consists of a series of horizontal black bars of varying lengths, arranged in a descending staircase pattern from top-left to bottom-right. On the left side of each bar, there are small vertical black segments of varying heights, some appearing as single dots and others as short vertical lines. The overall effect is that of a technical drawing or a schematic representation of a series of steps or a profile.

DYI: Currently eight named plaintiffs. Did not receive UID, email, or phone number for named plaintiffs until Dec. 2019 – Jan. 2020.

- Information that FB has about its users in human readable form.
- Pulls information from a dynamic dataset (including TAO).
- User generated data; some observed data; some derived data.

Steve Akins	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): N/A
Jason Ariciu	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Dec. 23, 2021; Jan. 4, 2022
Anthony Bell	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Oct. 26, 2021
Bridgett Burke (2 accounts)	User Accounts: Jan 23, 2020; Oct. 6, 2021 (second account); March 15, 2022; April 16, 2022 Pages (Admin Only): N/A
Terry Fischer	User Accounts: Jan 23, 2020; April 20, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): N/A
Tyler King (deleted account 2018)	User Accounts: March 15, 2022 (nothing available as of this date) Pages (Admin Only): N/A
Jordan O'Hara	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Oct. 26, 2021
Cheryl Senko	User Accounts: Jan 23, 2020; March 15, 2022; April 16, 2022 Pages (Admin Only): Nov. 23, 2021

TAO (The Associations & Objects): TAO is information contained within Facebook's production systems. Relationship between users (objects). Data is pulled from [REDACTED] [REDACTED]. DYI / [REDACTED] takes a snapshot.

- Objects & Associations once in TAO, but are no longer there? Potentially. TAO creates the user experience. It is a live [REDACTED]
- How User Generated Content gets removed from TAO? Example: User deletion.
- Facebook can remove objects and associations. Example: If a user blocks a friend.
 - Facebook deprecates products and features, and objects and associations would be deleted when this happens.
 - Preserved if snapshot prior to deprecation of product or feature
 - Preserved if data captured in Hive placed on legal hold.
 - Updated data overwrites existing data. Derived data is information FB creates about a user. For example: Content that you view and like which changes over time.
 - What has FB done to maintain Objects & Associations?
 - DYI & Switchboard at the particular time the snapshot is taken.
 - Not all observed or derived data is captured in these snapshots.
 - [REDACTED].

[REDACTED]

Steve Akins	User Accounts: March 9, 2020
Jason Ariciu	User Accounts: March 9, 2020
Anthony Bell	User Accounts: March 9, 2020
Bridgett Burke (2 accounts)	User Accounts: March 9, 2020; Sept. 27, 2021 (second account)
Terry Fischer	User Accounts: March 9, 2020
Tyler King (deleted account 2018)	User Accounts: March 9, 2020 Attempted to take [REDACTED] / DYI snapshots but data was no longer available.
Jordan O'Hara	User Accounts: March 9, 2020
Cheryl Senko	User Accounts: March 9, 2020

Note: In the aggregate, FB preserved 52 [REDACTED] snapshots across [REDACTED] Fall 2021 for the named plaintiffs when identified as [REDACTED]

Data Science:

- Hive:
 - What is Hive: [REDACTED] Captures and stores data about it's [REDACTED]
 - [REDACTED] in Hive
 - Data scientists / engineers have to create the hive table. Hive is the framework that allows teams to use the data for whatever business purpose.
 - Retention Policy: [REDACTED]

- [REDACTED]
- Hive on hold: Legal hold setting; eDiscovery is the only team who has ability to put Hive data on legal hold.
 - [REDACTED]
- [REDACTED] Hive tables on legal hold.

Deprecated Systems: Facebook's practice regarding deprecated systems is to transfer data from the deprecated system to the new system. Only storage system scheduled to be deprecated is [REDACTED] which stores large files (e.g., Photos; Videos). [REDACTED] is the new storage system and data is being migrated from [REDACTED] to [REDACTED]. Not aware of any other deprecated systems containing plaintiff data.